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MIGUEL RUIZ-ZAMORA
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 MIGUEL RUIZ-ZAMORA,

15 Defendant.
16

Case No. 1:25-cr-00042-KES-BAM

**STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER**

Date: September 24, 2025

Time: 1:00 p.m.

Judge: Hon. Barbara A. McAuliffe

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Calvin Lee, counsel for plaintiff, and Assistant Federal
19 Defender Laura Myers, counsel for Miguel Ruiz-Zamora, that the status conference currently
20 scheduled for August 13, 2025, at 1:00 p.m. may be continued to September 24, 2025, at 1:00
21 p.m.

22 The parties agree and stipulate, and request that the Court find the following. The
23 government provided an initial batch of discovery on March 11, 2025, and a supplemental batch
24 of discovery on April 9, 2025. The government has made a plea offer, and the parties are
25 currently engaged in ongoing plea negotiations. Defense Counsel requires additional time for
26 review of discovery, effective preparation of the case, and negotiation between the parties. In
27 light of the above, the parties are requesting that the matter be continued for a further status
28 conference. The continuance will conserve time and resources for the parties and the Court.

1 Based on the above-stated findings, the ends of justice served by continuing the case as
2 requested outweigh the interest of the public and the defendant in a trial within the original date
3 prescribed by the Speedy Trial Act. For the purpose of computing time under the Speedy Trial
4 Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period to September
5 24, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and
6 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at
7 defendant's request on the basis of the Court's finding that the ends of justice served by taking
8 such action outweigh the best interest of the public and the defendant in a speedy trial.

9
10 Respectfully submitted,

11 KIMBERLY A. SANCHEZ
12 Acting United States Attorney

13 Date: August 7, 2025

/s/ Calvin Lee
14 CALVIN LEE
15 Assistant United States Attorney
16 Attorney for Plaintiff

17 HEATHER E. WILLIAMS
18 Federal Defender

19 Date: August 7, 2025

/s/ Laura Myers
20 LAURA MYERS
21 Assistant Federal Defender
22 Attorney for Defendant
23 MIGUEL RUIZ-ZAMORA
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ORDER

IT IS SO ORDERED. The status conference currently scheduled for August 13, 2025, at 1:00 p.m. is hereby continued to **September 24, 2025, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. The time period to September 24, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: August 7, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE